

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO

In re:

ROMAN CATHOLIC CHURCH OF THE
ARCHDIOCESE OF SANTA FE, a New
Mexico Corporation,

Debtor,

Chapter 11

Case No. 18-13027-t11

ROMAN CATHOLIC CHURCH OF THE
ARCHDIOCESE OF SANTA FE, a New
Mexico Corporation,

Plaintiff,

v.

GREAT AMERICAN INSURANCE
COMPANY; ARROWOOD INDEMNITY
COMPANY, formerly known as Royal
Indemnity Company, successor by merger to
Royal Insurance Company of America; ST.
PAUL FIRE AND MARINE INSURANCE
COMPANY, as itself and as successor to or
assignee of St. Paul Mercury Insurance
Company and St. Paul Mercury Indemnity
Company; and UNITED STATES FIRE
INSURANCE COMPANY,

Defendants.

Adversary Proceeding No.:22-01005-t

**MOTION OF ARROWOOD INDEMNITY COMPANY TO WITHDRAW
THE GENERAL ORDER OF REFERENCE AND TO REMOVE THE
ADVERSARY PROCEEDING PENDING IN THE U.S. BANKRUPTCY
COURT FOR THE DISTRICT OF NEW MEXICO TO THE
U.S. DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO**

Arrowood Indemnity Company, formerly known as Royal Indemnity Company, successor by merger to Royal Insurance Company of America (“Arrowood”), pursuant to 28 U.S.C. § 157(d), Federal Rule of Bankruptcy Procedure 5011, and Local Rule 5011-1 of the U.S. Bankruptcy Court for the District of New Mexico (the “Bankruptcy Court”), and for good cause shown, hereby

respectfully moves to withdraw reference of the U.S. District Court for the District of New Mexico to the Bankruptcy Court with respect to *Roman Catholic Church of the Archdiocese of Santa Fe v. Great American Insurance Company, Arrowood Indemnity Insurance Company, St. Paul Fire and Marine Insurance Company, and United States Fire Insurance Company*, Adversary Proceeding No. 22-01005-t (the “Adversary Proceeding”), pursuant to original jurisdiction granted to the District Court by 28 U.S.C. § 1334(a) and diversity jurisdiction granted by 28 U.S.C. § 1332(a) and supported by the attached memorandum of law.

WHEREFORE, Arrowood Indemnity Company respectfully requests that the District Court:

1. Withdraw the Order of Reference to the Bankruptcy Court and remove the Adversary Proceeding to the District Court; and
2. Enter such other and further relief as the Court shall deem just and proper.

This the 28th day of February, 2022.

Respectfully submitted,

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Attorneys for Arrowood Indemnity Company

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2022, a true copy of the foregoing document was delivered via the CM/ECF filing system to all counsel of record.

/s/ Lisa Entress Pullen

Lisa Entress Pullen